

U.S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
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UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAKE CHARLES DIVISION

UNITED STATES OF AMERICA

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CRIMINAL NO. 2:14-cr-00229

VERSUS

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21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

18 U.S.C. § 922(g)(1)

MICHAEL WAYNE GIESE (01)

\*

CHUMPHAI BOB MIRELES (02)

\*

SANDRA LYNETTE SMITH (03)

\*

JUDGE WALTER

JUDGE KAY

INDICTMENT

THE FEDERAL GRAND JURY CHARGES:

COUNT 1

**Conspiracy to Distribute or Possess with the Intent to  
Distribute Controlled Dangerous Substances  
[21 U.S.C. § 846]**

From on or about the 1<sup>st</sup> day of January, 2014, and continuing to on or about the 3<sup>rd</sup> day of July, 2014, in the Western District of Louisiana, and elsewhere, the defendants, MICHAEL WAYNE GIESE, CHUMPHAI BOB MIRELES and SANDRA LYNETTE SMITH, knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to commit the following offense against the United States: to knowingly and intentionally distribute and possess with the intent to distribute methamphetamine, its salts, isomers, and salts of its isomers, and a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in

violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846. [21 U.S.C. § 846].

**Quantity of Methamphetamine Involved in the Conspiracy**

With respect to defendants MICHAEL WAYNE GIESE and CHUMPHAI BOB MIRELES, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is fifty (50) grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and five-hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A).

With respect to defendant SANDRA LYNETTE SMITH, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C).

**COUNT 2**  
**Distribution of Controlled Dangerous Substances**  
**[21 U.S.C. § 841(a)(1)]**

On or about the 2<sup>nd</sup> day of June, 2014, in the Western District of Louisiana, the defendant, CHUMPHAI BOB MIRELES, knowingly and intentionally distributed a mixture and substance containing a detectable amount of

methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)].

**COUNT 3**  
**Distribution of Controlled Dangerous Substances**  
**[21 U.S.C. § 841(a)(1)]**

On or about the 13<sup>th</sup> day of June, 2014, in the Western District of Louisiana, the defendant, SANDRA LYNETTE SMITH, knowingly and intentionally distributed a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)].

**COUNT 4**  
**Distribution of Controlled Dangerous Substances**  
**[21 U.S.C. § 841(a)(1)]**

On or about the 20<sup>th</sup> day of June, 2014, in the Western District of Louisiana, the defendant, SANDRA LYNETTE SMITH, knowingly and intentionally distributed a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)].

**COUNT 5**  
**Possession with Intent to Distribute a**  
**Controlled Dangerous Substance**  
**[21 U.S.C. § 841(a)(1)]**

On or about the 3<sup>rd</sup> day of July, 2014, in the Western District of Louisiana, the defendants, CHUMPHAI BOB MIRELES and SANDRA LYNETTE SMITH, knowingly and intentionally possessed with intent to distribute a mixture and

substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)].

**COUNT 6**  
**Possession of a Firearm by a Prohibited Person**  
**[18 U.S.C. § 922(g)(1)]**

On or about the 3<sup>rd</sup> day of July, 2014, in the Western District of Louisiana, the defendant, CHUMPHAI BOB MIRELES, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms and ammunition, that is, one Ruger, Model: P89, 9mm Pistol serial number 305-43928, one Smith & Wesson, .38 Caliber Special CTG, Revolver Serial Number S 946686, live rounds of .38 Caliber Special ammunition, live rounds of 9mm ammunition, said firearms and ammunition having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2). [18 U.S.C. § 922(g)(1) and 924(a)(2)].

**FIREARMS AND AMMUNITION FORFEITURE ALLEGATION**

1. The allegations contained in Count 6 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d). [18 U.S.C. § 924(d)].

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 922 set forth in Count 6 of this Indictment, the defendant, CHUMPHAI BOB MIRELES, shall forfeit to the United States pursuant to Title 18,

United States Code, Section 924(d) any firearms and ammunition involved or used in the commission of the offense, including, but not limited to:

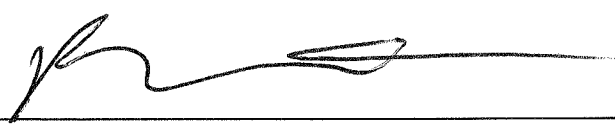
- a) one Ruger, Model: P89, 9mm Pistol serial number 305-43928;
- b) one Smith & Wesson, .38 Caliber Special CTG, Revolver Serial Number S 946686;
- c) live rounds of .38 Caliber Special ammunition; and
- d) live rounds of 9mm ammunition.

[Pursuant to 18 U.S.C. § 924(d)].

A TRUE BILL:

STEPHANIE A. FINLEY  
United States Attorney

 FOREPERSON: FEDERAL GRAND JURY

  
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